

**LAW OFFICES OF CHARLES J. PIVEN, P.A.**

CHARLES J. PIVEN  
MARSHALL N. PERKINS

THE WORLD TRADE CENTER ◊ BALTIMORE  
SUITE 2525  
401 EAST PRATT STREET  
BALTIMORE, MARYLAND 21202

Telephone (410) 332-0030  
Facsimile (410) 685-1300  
Email pivenlaw@erols.com

December 27, 2000

The Honorable Andre M. Davis  
United States District Court  
For the District of Maryland  
520 Garmatz United States Courthouse  
101 West Lombard Street  
Baltimore, Maryland 21201

Re: *Shreve, et al. v. Sears, Roebuck & Co., et al.*,  
Civil Action No. AMD 00-2162 (U.S.D. Md.)

FILED ENTERED  
LODGED RECEIVED

JAN 09 2001

AT LAW FIRM  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY

DEPUTY

Dear Judge Davis:

Our firm represents Plaintiffs in the above-referenced case. The purpose of this letter is to seek the Court's approval of the unopposed request for an extension of the discovery deadline as stated below:

On or about December 14, 2000, Plaintiffs noted the deposition of certain corporate designee(s) of Defendant Murray, Inc. That deposition(s) was set for our offices on January 2, 2001 (within the discovery deadline of January 3, 2001).

Defendants' counsel later identified Mr. Ray Elmy as the (only) responsive corporate designee. However, given certain holiday vacation plans, and possibly other time constraints, Defendants indicated that Mr. Elmy's deposition could not occur on January 2<sup>nd</sup>.

Accordingly, the parties have agreed that Plaintiffs can take Mr. Elmy's deposition on January 17 or 18, 2001, *via* telephone, with Mr. Elmy in Brentwood, Tennessee.

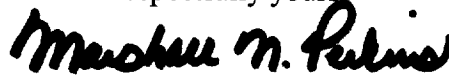
Jack L. Harvey, Esquire, Defendants' counsel, on behalf of Defendants, has agreed *not* to oppose this limited request to extend the discovery deadline. Because the proposed deposition dates are beyond the discovery deadline, Plaintiffs are requesting that the Court approve the parties' stipulation and agreement as to this limited issue.

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The foregoing agreement will *not* affect other deadlines, such as the dispositive motions deadline or the trial date.

For each of these reasons, Plaintiffs ask the Court to approve the foregoing request. Plaintiffs thank Your Honor for the Court's attention to this matter. Please call the parties' counsel with any questions.

Respectfully yours,



Marshall N. Perkins

cc: Jack L. Harvey, Esquire

IT IS SO ORDERED, this 9<sup>th</sup> day of Jan, 2001.



The Honorable Andre M. Davis